

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

Pierre G. Thorsen,

Plaintiff,

v.

Community Unit School District 300,

Defendant.

Case No. 3:20-cv-50132

Judge Iain D. Johnston

Magistrate Judge Margaret J. Schneider

JOINT STATUS REPORT

Plaintiff Pierre G. Thorsen (“Thorsen”) and Defendant Community Unit School District 300 (“D300”), hereby submit the following joint status report:

- A. Defendant, D300, and Plaintiff, Thorsen, submitted Rule 26(1) disclosures on or about August 30, 2021.
- B. Plaintiff submitted his responses to a Request to Admit and Interrogatories on or about October 29, 2021.
- C. Defendant answered Interrogatories and a Notice to Produce on December 16, 2021, with many objections which included objections based on State and Federal limitations on the disclosure of student record information. Defendant supplemented its production on January 29, 2022. Defendant has produced over 600 pages of responsive records in addition to the substantive responses to Plaintiff’s Interrogatories and Requests to Produce.
- D. On December 17, 2021, Plaintiff initially requested a F.R.C.P. 26 (b)(5) privilege log regarding documents withheld for privilege. The District provided Plaintiff with a privilege log on January 29, 2022.

- E. Plaintiff and Defendant have not resolved their differences over the District's discovery responses, despite exchanges over the past months. The District continues to maintain that it has provided relevant information in its possession proportionate to the needs of the case. Plaintiff continues to seek discovery of additional information. This court has received briefs on Plaintiff's Motion to Compel.
- F. CUSD 300 took the deposition of Pierre Thorsen on June 7, 2022. Pierre Thorsen took the depositions of Mike Williamson, June 8, 2022, and Colleen O' Keefe, June 16, 2022. Thorsen is set to take Lynn Adler, June 30, 2022, and Kara McMahon in early July 2022. CUSD 300 has no other witnesses disclosed order F.R.Civ.P.26.
- G. Pierre Thorsen has been attempting to take the deposition of Aliyah Chaudhry, with the cooperation of her approved counsel. District 300 has just learned of this attempt and objects to the necessity and relevance of this deposition
- H. The parties expect to complete depositions fact discovery by August 15, 2022.

Dated: June 27, 2022

PIERRE G. THORSEN

By: /s/Timothy J. Lowery

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Dated: June 27, 2022

COMMUNITY UNIT SCHOOL
DISTRICT 300

By: /s/ Abigail Rogers

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